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VIA ECF AND ELECTRONIC MAIL

February 10, 2021

The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
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DATE FILED: February 12, 2021

MEMO ENDORSED

Re: *Ferguson, et al. v. Ruane Cunniff & Goldfarb Inc., et al.*
Case No. 1:17-cv-06685-ALC-BCM

Dear Judge Carter:

We represent Plaintiffs, Michael L. Ferguson, Myrl C. Jeffcoat, and Deborah Smith (“Plaintiffs”), in the above-captioned action. We write pursuant to Your Honor’s Individual Practices to request permission to file a redacted version of Plaintiffs’ Response Memorandum of Law in Further Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement and For Related Relief, as well as certain supporting exhibits (collectively, “Plaintiffs’ Response”), on the public docket, with the un-redacted versions maintained under seal.

Plaintiffs’ Response contains certain information from the June 5, 2020 settlement agreement between Claimants and RCG, and related releases, produced to Plaintiffs pursuant to the August 10, 2020 Order (“Order”) issued by Magistrate Judge Moses. (See ECF No. 195.) Consistent with the Order, the settlement agreement and related releases were produced to Plaintiffs subject to the parties’ stipulated Confidentiality Agreement and Protective Order and bear a confidential designation, and are purportedly subject to confidentiality agreements governing the arbitrations.

Plaintiffs request that they be permitted to file the un-redacted version of Plaintiffs’ Response under seal in order to protect any applicable confidentiality interests of the parties to the arbitrations.

† Admitted to practice law in CT, NY and PA

The Honorable Barbara C. Moses
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Respectfully submitted,

/s/ Laurie Rubinow
Laurie Rubinow

Attorney for Plaintiffs and the Proposed Class

cc: All counsel of record (by ECF)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

February 12, 2021